

6 A. Chuck McDonnell has approximately 25. The
7 balance would be in Nina's group.

8 Q. So about a hundred, maybe a little less, are the
9 entry people, the service reps and the order writers?

10 A. Yes.

11 Q. Where does the completion group fall within this
12 array of personnel?

13 A. They report to Nina Ganoza.

14 Q. So they are in that group of perhaps a little
15 less than a hundred?

16 A. Yes.

17 Q. So when the order has gone back to the command
18 center and do they -- they put a notation on it?

19 A. No.

20 Q. So they take it, they look to see that the
21 service representative has put a notation on it, and then
22 they forward it on to the completion desk?

23 A. Yes.

24 Q. What does the completion desk do?

25 A. They receive the incoming order that's in the
0126

1 package, and they take the package and they file it by
2 completion date. So in this hypothetical scenario, if the
3 due date on this migration is March the 27th, they will
4 file that order in that package in a file that says 27 on
5 it.

6 And in the afternoon of the 27th, they will go
7 in and pull that order up in the SORD system to ensure

8 that the order is completed in SORD, which means that it
9 has successfully migrated over to the CLC. And then, they
10 will go in and begin the completion process that I
11 described earlier, where they input the information on the
12 completion screen, send it through CLEO to get it on a
13 batch to get it on the feed via the NDM.

14 Q. Now, the listing change, the Yellow Page
15 listing, the White Page listing, when is that -- I think
16 earlier, your testimony was that's done after the
17 migration has been accomplished; is that right?

18 A. Uhm-hum.

19 Q. Is that done at the completion desk?

20 A. No, it isn't. When the completion information
21 is sent, just before the completion is sent, the process
22 dictates that we enter into the Gateway system the
23 listing.

24 Q. Let me stop you there. What's the Gateway
25 system?

0127

1 A. The Gateway system is the system that we use to
2 input a listing into the 411 database.

3 Q. Who makes that entry?

4 A. It can be a completions person or it could be a
5 data entry person.

6 Q. What determines who does the entry?

7 A. Workload.

8 Q. And that is only done, the listing alteration is
9 only done after migration -- after the SORD database shows

10 the migration has been accomplished; is that right?

11 A. Yes.

12 Q. And at that point, the completion desk -- tell
13 me how this happens.

14 At a certain time during the day, does the
15 completion desk get a run of what SORD shows has been
16 completed? How are they alerted to pull the ones that are
17 done and do some processing of them?

18 A. By the completion files. They work off of the
19 dates for the completion files.

20 Q. So if today is March 21, the people at the
21 completion desk will take all the packages that had 21 as
22 a due date, and go into SORD to see if it's been
23 completed, or how is that done?

24 A. Yes, that is correct.

25 Q. Well, explain it so I can understand it. Today
0128

1 is the 21st, and are these things kept in boxes or file

2 folders, how are they maintained?

3

4 A. Both in boxes and file cabinets.

5 Q. So today is the 21, I go to the file cabinet and
6 I pull out a bunch of files that have 21 as the due date.

7 Would I do that at 9:00 o'clock in the morning?

8 A. No.

9 Q. What's the process?

10 A. In the afternoon of the 21st and on the 22nd,
11 the day after completion, we go into SORD to verify that

12 the order has successfully migrated over, and once it has
13 successfully migrated over, then we enter completion at
14 that time.

15 Q. What time does the completion desk commence
16 looking for completions for that day?

17 A. They work until 11:00 o'clock at night. They
18 work all the way to 11:00 p.m.

19 Q. Do they start at 2:00 o'clock in the afternoon
20 looking for completions of that day?

21 A. I don't know the exact time. I know that it's
22 in the afternoon that they begin looking for that day.

23 Q. So then they look, and we have a hypothetical
24 file that's got a due date of March 21, and the completion
25 desk personnel had gotten that presumably what, three days
0129

1 earlier? After they had gone through the whole process,
2 and it's been sitting in a file cabinet or box for three
3 days, it's the afternoon of the 21st. They pull it up,
4 they pull up the file physically, I assume, and they sit
5 down at a screen. Do they have the SORD screen in front
6 of them?

7 A. Yes.

8 Q. What happens if they look at that and it doesn't
9 show a completion?

10 A. Then they need to do research to find out why
11 that order has not been completed by the system.

12 Q. How do they do that research?

13 A. They pull up the copy of the order.

14 Q. The physical copy out of the file?

15 A. Out of the file, and they will go to the SORD
16 system itself because they have to go into the system to
17 see if there's a completion indicator on the order. If
18 there is no indicator, then the SORD order will show an
19 edit, and it will tell the service representative why the
20 order has edited out an error. So that gives the service
21 rep the opportunity to go back into the order, and correct
22 whatever was incorrect, for whatever reason, and get it
23 back into the system so that it can flow through.

24 Q. Is there any processor system in place for that
25 edit to be identified prior to the due date?

0130

1 A. I believe you would need to check with Nina
2 Ganoza on that.

3 Q. Are you aware of anything?

4 A. No, I am not.

5 Q. To your knowledge, there is not -- there is no
6 kind of system in place that generates, here is a trouble
7 list, here are all the migration orders for which an edit
8 was produced, whether it was something that doesn't have a
9 due date for two days, or in another day? To your
10 knowledge, there is no such system in place; is that
11 right?

12 A. The SORD system will generate reports. I don't
13 know the names of the reports, but I know that there are
14 several different types of reports that will be generated,
15 depending upon at what cycle the order is in, that will

16 allow us to -- the service representatives to work off of
17 the list that says, these orders errored out, so that
18 doesn't allow them to work them prior to that completion.

19 Q. To your knowledge, an inquiry could be made into
20 SORD to say, please generate a list of all the orders that
21 have errored out in the last 6 hours or 12 hours or 24
22 hours?

23 A. It's not exactly an inquiry. It's a preset
24 command that will automatically generate different types
25 of reports.

0131

1 Q. Is such a report generated within the LISC?

2 A. Yes.

3 Q. When are those generated?

4 A. I don't know. You need to check with Nina
5 Ganoza.

6 Q. But it's your understanding that such reports
7 are issued or generated on a regular basis?

8 A. Yes, they are.

9 Q. Assuming we are at the completion desk, and the
10 person goes into the SORD system, and they see an
11 indication that the migration has been completed, what is
12 it that the completion desk person does then?

13 A. They will go into CLEO, pull up the completion
14 screen and enter the completion information onto the
15 completion screen and send it.

16 Q. I am trying to figure out, when does the LISC
17 function, when does that occur?

20 desk might do it?

21 A. Yes.

22 Q. In other instances, because of workload or
23 whatever, they leave it for someone else to do, and then
24 it goes to someone who specializes in doing the listings?

25 A. Yes.

0133

1 Q. And the standard is that listing change is done
2 within either the day of the completion or within the —
3 or by the next day?

4 A. Yes. It's normally done the day of the
5 completion or within a few days of completion.

6 Q. And then you have described then for us that the
7 entire process that this hypothetical migration order will
8 go through to accomplish the migration and to give notice
9 to the CLC that migration has been accomplished?

10 A. The listing person also does E911 input.

11 Q. What do they do for that?

12 A. They go into a separate Gateway system, and they
13 input the E911 information and note the front of the
14 package.

15 Q. Is that done solely by the listing person, in
16 every instance, or is it sometimes done by the completion
17 desk?

18 A. It can be done by the completion desk by the
19 listing person or it can be done by the E911 person.

20 Q. Does that bring to a close what happens with
21 this migration order?

0136

1 Q. Do you believe that that approximate number

2 accurately states the number of orders the LISC was

3 capable of processing at that time?

4 A. I can't agree or disagree with that, because I

5 don't know what the actual capacity was, so I wouldn't be

6 able to agree or disagree.

7 Q. Do you know who Mr. Sinn is?

8 A. Yes, he is —

9 Q. Do you think that he would have sent a letter to

10 Ms. Collier that incorrectly stated the capacity of the

11 LISC?

12 MR. KOLTO-WININGER: Objection. Lacks

13 foundation; calls for speculation, but go ahead and

14 answer.

15 THE WITNESS: I don't know what his reason was

16 for sending the letter, so I can't answer for him.

17 MR. McDONALD: Q. So you think it's possible

18 that he may have made a mistake in this letter; is that

19 right?

20 MR. KOLTO-WININGER: Objection. Lacks

21 foundation; calls for speculation. Go ahead and answer.

22 THE WITNESS: I wouldn't be able to answer that.

23 MR. McDONALD: Q. So you don't have a clue as

24 to what the LISC capacity was in December of 1996?

25 A. No, I don't recall. That was quite a while ago.

0137

1 I don't recall what it was.

2 Q. Do you know if, at the time, if it was more or

3 less than 1000 orders per day?

4 A. I don't know what the volumes were, so I can't
5 do an estimate.

6 Q. In your role as a business manager for the LISC,
7 you weren't made aware of what the volumes were?

8 A. No, I wasn't.

9 Q. Who was?

10 A. Well, I don't know, I don't know who was.

11 Q. You didn't think it was something you should
12 know in your role as a business manager for the LISC?

13 A. At the time, no.

14 Q. Currently?

15 A. Currently?

16 Q. Is it something you should know, you need to
17 know?

18 A. In my current capacity?

19 Q. Sure.

20 A. It could be relative.

21 Q. What's changed between December and currently?

22 A. In December, I had responsibility for the
23 expedite and escalation group, so my main focus was
24 getting orders expedited through the center for a variety
25 of different reasons. Now, my current role that I just
0138

1 took over is customer care, so I might have more of an
2 interest in knowing what the volumes are in that role.

3 Q. With respect to expedites, wasn't there an issue
4 of attempting to expedite orders ahead of other orders?

5 Is that one of the issues you needed to address?

6 A. Yes.

7 Q. Wasn't the LISC capacity to handle orders an
8 issue that you needed to be aware of?

9 A. In order to successfully expedite orders, no.

10 Q. So the fact that there may be a backlog of
11 several thousand orders, and the LISC capacity may only be
12 400 orders per day, did not impact upon your ability to
13 escalate certain orders to be expedited through the
14 process?

15 A. No, it did not.

16 Q. Do you see, in the second sentence of that third
17 paragraph on Exhibit 4, it says in part, "We will move to
18 approximately 2000 orders per day by the end of January
19 1997?"

20 A. Yes.

21 Q. Are you aware if the LISC ever was able to reach
22 a capacity of approximately 2000 orders per day by the end
23 of January?

24 MR. KOLTO-WININGER: You can answer if you know
25 that we never hit that number. You can say yes or no.
0139

1 THE WITNESS: No.

2 MR. McDONALD: Q. To make sure I understand the
3 answer, does that mean you understand that 2000 orders per
4 day was never reached, or that you don't know?

5 A. Well, maybe I don't understand the question,

6 because 2000 orders per day reached -- this letter says we

7 will move to approximately 2000 orders per day, it doesn't
8 say what we will move to -- what does move mean? I don't
9 understand what this sentence --

10 Q. Okay.

11 MR. KOLTO-WININGER: Answer if you know, if we
12 have ever reached 2000 orders per day.

13 THE WITNESS: I do not know the answer to that
14 question.

15 MR. McDONALD: Q. At any point in time, have
16 you been aware of the LISC's capacity?

17 A. In what respect?

18 Q. How many orders per day it could process.

19 MR. KOLTO-WININGER: You don't have to be
20 certain as to the exact number. You don't have to give
21 the numbers. That's a yes or no question.

22 THE WITNESS: Yes.

23 MR. McDONALD: Q. When were you aware as to the
24 LISC's capacity?

25 A. January, February time frame.

0140

1 Q. In the last month or two?

2 A. Yes.

3 Q. Are you aware of the LISC capacity during those
4 time periods, January and February of 1997?

5 A. Yes.

6 Q. And during those time periods, did the LISC ever
7 have the capacity to process approximately 2000 orders per
8 day?

9 A. I don't know the answer to that question.

10 Q. I thought you said that you were aware of the
11 LISC's capacity during January, February of 1997.

12 MR. KOLTO-WININGER: At various times or in
13 every day --

14 MR. McDONALD: I'm sorry?

15 MR. KOLTO-WININGER: Objection. Vague as to
16 time.

17 MR. McDONALD: Q. In January and February of
18 1997.

19 MR. KOLTO-WININGER: Off the record.

20 (Discussion off the record.)

21 MR. CHANG: Ms. Long, during the time period
22 that you knew what the LISC capacity was in February and
23 January of 1997, did the LISC ever reach 2000 orders per
24 day processing, yes or no?

25 MR. KOLTO-WININGER: Did it ever exceed that, as
0141
1 far as you know?

2 THE WITNESS: I don't know.

3 MR. KOLTO-WININGER: The answer is no, then you
4 don't know.

5 MR. CHANG: That's not what I asked. I didn't
6 ask if she knew it.

7 MR. KOLTO-WININGER: The answer is no.

8 MR. CHANG: Did the LISC, during 1997, January
9 or February, ever process 2000 orders a day?

10 MR. KOLTO-WININGER: Let's go off the record for

1 a second.

12 MR. McDONALD: Off the record.

13 (Discussion off the record.)

14 MR. CHANG: In January and February 1997, did
15 the LISC ever process 2000 orders a day?

16 THE WITNESS: I don't know.

17 MR. KOLTO-WININGER: You can't ask it that way.

18 MR. McDONALD: The question has been asked and
19 it's been answered, so --

20 MR. KOLTO-WININGER: That's fine. You will get
21 a better answer if you ask it the other way.

22 MR. McDONALD: Maybe an accurate answer.

23 MR. KOLTO-WININGER: I am assuming we are here
to get that, but --

25 MR. McDONALD: Do you have Exhibit 6?
0142

1 MR. KOLTO-WININGER: Yeah, I think I do.

2 MR. McDONALD: Q. If you could look at the
3 third paragraph on the first page, the last paragraph, and
4 this is a three-page letter dated December 13th, 1996,
5 from Thomas O. Moulton, Junior, to the Honorable Reed E.
6 Hundt, H-u-n-d-t.

7 Have you had a chance to at least read that
8 third paragraph on Page 1 of Exhibit 6?

9 A. Yes.

10 Q. Do you see, in the second sentence, it reads,
11 "We now will be prepared to handle 2000 orders per day by
year's end and 4000 orders a day by the end of January

15 I would suggest -- we are going to have her come back in a
16 week, and it's certainly going to be an issue, and I'd
17 like to get it resolved before we resume.

18 MR. KOLTO-WININGER: I think we should resolve
19 it between now and then, I agree. I even think there is a
20 better witness to answer it, but I agree that if we
21 resolve it by then, you should ask Ms. Long those
22 questions. I would request that we engage Sprint in this
23 discussion, so that we are not seen as disclosing any
24 information that's confidential to Sprint.

25 MR. CHANG: Is it your position that we need to
0144
1 get the other 60 odd CLCs involved also?

2 MR. KOLTO-WININGER: No, I think you are being
3 facetious, but if we get down to Sprint, we will probably
4 be taking care of at least the three in the long distance
5 market.

6 MR. CHANG: I just want to ascertain your
7 position. We have a habit of ascertaining our thoughts,
8 especially mine, so I want to find out from you.

9 MS. LEE: Your position is that if Sprint agrees
10 to have the number of orders processed per day at the LISC
11 disclosed on the record, then you will instruct Ms. Long
12 to answer the question?

13 MR. KOLTO-WININGER: My position is that that is
14 the minimum necessary, and I believe we should discuss
15 this off the record and discuss this off line, and find
16 out if we can get to a reasonable solution.

17 And I am willing to be the first to say, let's
18 take this to the commission if we can't resolve it. So
19 that at least we will be ordered to cough up that number,
20 and so that we won't violate proprietary information
21 needlessly.

22 MS. LEE: I want to find out your position on
23 the record. What's your real position?

24 MR. COLTO-WININGER: I need to discuss this with
25 people at Pacific Bell. I know that that is the minimum
0145
1 necessary condition, because they are the big three
2 carriers for long distance. So in my mind, that's a
3 minimum necessary condition, and I know we don't even have
4 that today.

5 And I would prefer, at some point, if we do have
6 a disagreement and we end up taking the position that
7 that's not sufficient, I would prefer to be ordered by the
8 commission to, even through an informal discussion with
9 Judge Walker, to be told to disclose numbers, so that we
10 aren't seen as violating anybody else's confidential
11 proprietary information.

12 MS. LEE: All right. We can go off the record.

13 MR. CHANG: Due to the witness' undisclosed and
14 unforeseen inability to stay for the full day, we are
15 going to suspend the deposition for her convenience until
16 next Friday.

17 And you understand that it will be a full day,
18 Ms. Long?

19 THE WITNESS: Yes, I do.

20 MR. CHANG: Thank you.

21 MS. LEE: What time are we reconvening?

22 MR. CHANG: At 9:30.

23 (Whereupon, the proceedings were adjourned
24 at 2:45 p.m.)

25 -- oOo --

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1 CERTIFICATE OF WITNESS

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3

4

5 I, the undersigned, declare under penalty of

6 perjury that I have read the foregoing transcript, and I

7 have made any corrections, additions, or deletions that I

8 was desirous of making; that the foregoing is a true and

9 correct transcript of my testimony contained therein.

10

11 EXECUTED this day of ,

12 19 , at ,

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16 ANN MARIE LONG

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1)

2 STATE OF CALIFORNIA) ss.

3)

4 I, SANDRA L. CARRANZA, the undersigned, a Certified

5 Shorthand Reporter of the State of California, hereby

6 certify that the witness in the foregoing deposition was

7 by me duly sworn to testify to the truth, the whole truth,

8 and nothing but the truth in the within-entitled cause;

9 that said deposition was taken at the time and place

10 therein stated; that the testimony of said witness was

11 reported by me, a Certified Shorthand Reporter, and a

12 disinterested person, and was thereafter transcribed under

13 my direction into typewriting; that the foregoing is a

14 full, complete, and true record of said testimony.

15 I further certify that I am not of counsel or

16 attorney for either or any of the parties in the foregoing

17 deposition and caption named, or in any way interested in

18 the outcome of the cause named in said caption.

19 IN WITNESS WHEREOF, I have hereunto set my hand this

20 day of , 1997.

21

SANDRA L. CARRANZA
Certified Shorthand Reporter

22

Registered Professional Reporter

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24

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1

CHAMBERLIN & ASSOCIATES

Certified Shorthand Reporters

2

Two Embarcadero Center, Suite 1710

San Francisco, California 94111

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3/26/97

4

TO: ANN MARIE LONG

5

PILLSBURY, MADISON & SUTRO

c/o ED KOLTO-WININGER, ATTORNEY AT LAW

6

235 Montgomery Street

San Francisco, California 94104

7

RE: MCI TELECOMMUNICATIONS CORPORATION vs. PACIFIC

8

BELL AND PACIFIC BELL COMMUNICATIONS

Date of Deposition: March 21, 1997, Volume I

9

Reported By: SANDRA L. CARRANZA, CSR 7062

10 ANN MARIE LONG:

11

The original transcript of your deposition taken in
the above-entitled action has been prepared and is

12

available at this office for your reading, correcting, and
signing.

13

You may wish to discuss this matter with your
attorney to determine if counsel requires that the
original transcript of your deposition be read, corrected;
and signed by you before it is sealed.

16

Your rights regarding signature of this deposition
are contained in the California Code of Civil Procedure.

17

Unless otherwise directed, your original deposition
transcript will be sealed after 35 days from today's date.

19

If you wish to make arrangements to review the
original transcript of your deposition, please contact
this office during office hours, 9:00 to 5:00 Monday
through Friday, to make an appointment to review the
original transcript.

22

Sincerely,

23

SANDRA L. CARRANZA

Certified Shorthand Reporter

24

Registered Professional Reporter

25 cc: All Counsel
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1 BEFORE THE PUBLIC UTILITIES COMMISSION

2 IN AND FOR THE STATE OF CALIFORNIA

3 --- o0o ---

4 MCI TELECOMMUNICATIONS CORPORATION,
Complainant,

5 vs. NO. 96-12-026

6 PACIFIC BELL AND PACIFIC BELL COMMUNICATIONS,
Defendants.

7

8 AT&T COMMUNICATIONS OF CALIFORNIA, INC.
Complainant,

9 vs. NO. 96-12-044

10 PACIFIC BELL,
Defendant.

11 -----//

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13

14 DEPOSITION OF ANN MARIE LONG

15 March 28, 1997

16 Volume II, Pages 149 through 349, inclusive

17

REPORTED BY:

18 SANDRA L. CARRANZA, CSR NO. 7062, RPR

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1 INDEX

2 DEPOSITION OF ANN MARIE LONG

0171

1 (Record read.)

2 MR. KOLTO-WININGER: Why don't you go ahead and
3 pick up that answer, and just in terms of aggregate, if
4 you know.

5 THE WITNESS: I don't know. I just know that we
6 began receiving a very large amount of orders, and I
7 remember that it was like the very beginning of October.

8 MR. McDONALD: Q. Do you know if the orders
9 that were being received in the beginning of October
10 exceeded 1000 orders per day?

11 A. No, I don't know the answer to that.

12 Q. Do you know if it was less than a thousand or
13 more than a thousand?

14 A. No, I don't.

15 Q. Do you know if it was more than 2000?

16 A. No.

17 Q. So it could have been more than 2000 per day?

18 A. I don't know what the volumes were, so I can't
19 answer that. I don't know. I only know what I saw. I
20 don't know what the numbers were.

21 MR. KOLTO-WININGER: Why don't you explain that
22 just so they have some light.

23 THE WITNESS: We have five fax machines in
24 hunting with 500-page memory, and every fax machine was
25 maxed out to the point where we had to shut them off at
0172

1 5:00 o'clock. We had to hire an individual to monitor the
2 fax machines and keep taking the paper off of the

3 machines, because if they didn't, paper would overflow.

4 And that individual would literally, every
5 couple of minutes take and empty one machine, and take it
6 to the command center, and grab more and take it to the
7 command center. And it was a full-time job that kept one
8 individual busy, just taking paper and stacks off of the
9 fax machine all day from 8:00 to 5:00.

10 MR. KOLTO-WININGER: So you are saying that's
11 your perspective of what the volume increased?

12 THE WITNESS: Yeah. And to go from one fax
13 machine in September to five fax machines with 500 pages
14 of memory, and an individual that had to monitor those
15 machines all day long, and keep feeding more and more and
16 more paper into them all day long, when each order, it's
17 important to note, is anywhere from six to nine pages
18 long, so I visually saw literally stacks of paper.

19 MR. McDONALD: Q. And when the paper came in,
20 it was then brought to the command center, and there were
21 some -- the LTD wasn't in place in October, but there was
22 some system for trying to track the orders?

23 A. Yes, yes, there was a system.

24 Q. And that system did not allow you, on a daily
25 basis, to know what the number of orders had been received
0173
1 in the prior day or the prior week?

2 A. Correct.

3 Q. You didn't think it was necessary to know that
4 for your position at the LISC?

5 A. For me in particular at that time, no, it was

0001

1 BEFORE THE PUBLIC UTILITIES COMMISSION

2 IN AND FOR THE STATE OF CALIFORNIA

3 --- o0o ---

4 MCI TELECOMMUNICATIONS CORPORATION,
Complainant,

5 vs. NO. 96-12-026

6 PACIFIC BELL AND PACIFIC BELL COMMUNICATIONS,
Defendants.

7

8 AT&T COMMUNICATIONS OF CALIFORNIA, INC.
Complainant,

9 vs. NO. 96-12-044

10 PACIFIC BELL,
Defendant.

11 -----//

12

13

14 DEPOSITION OF MICHAEL MALLIN

15 April 15, 1997

16

17

18 REPORTED BY:

19 SANDRA L. CARRANZA, CSR NO. 7062, RPR

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2 DEPOSITION OF MICHAEL MALLIN

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0003

1 APPEARANCES

2

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